

# UNITED STATES DISTRICT COURT

for the

Eastern District of Wisconsin

United States of America

v.

Marcus D. Tanksley  
DOB: 5/18/1987

Case No. 22-M-708

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 17, 2022 in the county of Milwaukee in the  
Eastern District of Wisconsin, the defendant(s) violated:

*Code Section*

18 U.S.C. Section 1038(a)(1)

*Offense Description*

Intentionally conveying false or misleading information under circumstances  
in which such information may reasonably have been believed

This criminal complaint is based on these facts:

See attached Affidavit.

☒ Continued on the attached sheet.

**WILLIAM SANTIAGO JR**

Digitally signed by WILLIAM  
SANTIAGO JR  
Date: 2022.07.29 11:48:05 -05'00'

*Complainant's signature*

**William Santiago, Special Agent - DHS (FPS)**

*Printed name and title*

Sworn via telephone; transmitted via email  
pursuant to Fed. R. Crim. 4.1

Date: 07/29/2022

**s/ William C. Griesbach**

*Judge's signature*

City and state: Green Bay, Wisconsin

**William C. Griesbach, U.S. District Judge**

*Printed name and title*

AFFIDAVIT IN SUPPORT OF  
AN APPLICATION FOR A CRIMINAL COMPLAINT

I, William Santiago, being first duly sworn on oath, on information and belief state:

1. I am a Special Agent with the Department of Homeland Security, Federal Protective Services (FPS), and have been so employed for approximately 12 years. My current responsibilities include the investigation of violations of criminal law and administrative regulations that occur on federal property and/or involve federal agencies or employees.

2. This affidavit is submitted in support of a criminal complaint alleging that on or about July 17, 2022, in the State and Eastern District of Wisconsin, MARCUS D. TANKSLEY, date of birth 05/18/1987, violated Title 18, United States Code, Section 1038(a)(1), by intentionally conveying false or misleading information under circumstances in which such information may reasonably have been believed. The false or misleading information indicated that an activity had taken, was taking, or would take place that would constitute a violation of Chapter 40 of Title 18, United States Code, that is 18 U.S.C. 844(f)(1), relating to malicious destruction of or an attempt to damage and destroy, by means of an explosive, any building or real property owned or possessed by, or leased to, the United States or any department or agency thereof.

3. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging TANKSLEY with the crime detailed above, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that TANKSLEY committed the offense alleged in the complaint.

4. The information in this affidavit is based upon information obtained from other law enforcement officers, including reports I have read and conversations I have had with individuals personally knowledgeable of the events and circumstances described herein.

5. On July 17, 2022, at 12:06 AM, Milwaukee Police Officer Jacob Roecker was dispatched to a bomb threat at the Milwaukee Federal Courthouse, 504 E. Michigan Street, Milwaukee, Wisconsin. Upon arrival, Officer Roecker observed a small white piece of paper with a small rock on top of the paper outside of an emergency exit door of the Federal Courthouse. The address of the specific emergency door is 504 E. Michigan Street, Milwaukee, Wisconsin. Officer Roecker observed handwritten words on the piece of paper stating, "This building will be bombed." Officer Roecker took possession of the note and the rock and inventoried the items.

6. On July 23, 2022, Milwaukee Police Officer Joseph D. Goggins was provided photos from the surveillance video of the suspect who appeared to place the threat note at the Federal Courthouse. Officer Goggins identified the suspect as MARCUS D. TANKSLEY, who was then located and arrested by Milwaukee Police Department.

7. On July 23, 2022, at approximately, 12:12pm, Milwaukee Police Detective Jolene Del Moral interviewed TANKSLEY. Detective Del Moral mirandized TANKSLEY, and TANKSLEY waived his rights and agreed to be interviewed. TANKSLEY then admitted to (1) writing the threatening note with a rock on top of it, and (2) placing it next to the glass (emergency) door of the Federal Courthouse. Detective Del Moral showed TANKSLEY video surveillance photos of the area, and TANKSLEY admitted he is the person in the video surveillance photos. At the time of the interview, Detective Del Moral took photos of TANKSLEY as he appeared to be wearing the same clothes during the interview that he had been wearing at the time video

surveillance recorded TANKSLEY placing the bomb threat note outside the Federal Courthouse door.

8. Based upon the information contained in this affidavit, I submit that there is probable cause to believe that MARCUS D. TANKSLEY violated Title 18, United States Code, Section 1038(a)(1) by intentionally conveying false information regarding the future violation of Title 18, United States Code, 18 U.S.C. 844(f)(1) by the bombing of the Federal Courthouse in Milwaukee, Wisconsin.